

**WIGDOR.**

**Jeanne M. Christensen**

[jchristensen@wigdorlaw.com](mailto:jchristensen@wigdorlaw.com)

February 27, 2025

**VIA ECF**

The Honorable Robyn F. Tarnofsky  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 9B  
New York, NY 10007

Re: Parker v. Bursor, et al., Civil Case No. 24 Civ. 245 (JGLC)(RFT)

Dear Judge Tarnofsky:

We represent Plaintiff Angelica Parker ("Plaintiff") in the above captioned matter.

We write to follow up regarding whether Plaintiff objects to an exhibit Defendants' asked to admit yesterday through their expert Paul Neale that had not been included on their exhibit list exchanged with Plaintiff or submitted to the Court prior to the hearing. *See* Tr. at 69-71 (attached). The proposed exhibit (it was not assigned a DX number) is an excel that Mr. Neale said he created by combining data from two excels Plaintiff produced about Sideline messages, *see* PX 6 and PX 7 (Bates Nos. PL129856; PL142250). Plaintiff objects to admission of the created excel. Our review of that document with the original excels (PX 6 and 7) shows a number of inaccurate representations of the data. For example, the proffered exhibit changes the order of at least 15 entries, includes a duplicate entry and contains incorrect time entries for the phone calls and text messages throughout the proffered exhibit (time discrepancies of 3 and 4 hours for majority of the entries). There is no reason why Defendants cannot admit PX 6 and PX 7, as these exhibits contain the correct data.

We thank the Court for the additional time to review the following exhibits: DX 34, DX 39, DX 47, DX 97, and DX 99 and Plaintiff has no objection to these.

We thank the court for its time and attention to this matter.

Respectfully Submitted,



Jeanne M. Christensen

The proposed exhibit is not received into evidence.

Dated: New York, New York  
March 3, 2025

SO ORDERED  
  
ROBYN F. TARNOFSKY  
UNITED STATES MAGISTRATE JUDGE